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3 April 2014

Via Email and First Class Mail

Ms. Sharon Fang (3H521) Remedial Project Manager U.S. Environmental Protection Agency – Region III 1650 Arch Street Philadelphia, PA 19103

Subject: Monthly Progress Report No. 20

Operable Unit 2 North Penn Area 5 (NP5OU2) Superfund Site

Unilateral Administrative Order (UAO) Docket No. CERCLA-03-2012-0205DC

Dear Ms. Fang:

Please find enclosed three (3) copies of the written Monthly Progress Report that provides a summary of actions and activities undertaken pursuant to the above referenced UAO for NP5OU2 Superfund Site. If you have any questions, please do not hesitate to contact me.

Sincerely,

Derek W. Tomlinson, P.E.

Project Coordinator

Attachment: Monthly Progress Report

cc: Dennis Kutz, PADEP (via email & 1 hardcopy first class mail)

M. Joel Bolstein, Esq., FoxRothschild (via email)

Chris Voci, P.G., Geosyntec (via email)

File – PH0013



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MONTHLY PROGRESS REPORT

Operable Unit 2 North Penn Area 5 Superfund Site USEPA Unilateral Administrative Order Docket No. CERCLA 03-2012-0205DC

Monthly Progress Report No. 20 Reporting Period: March 2014 Report Date: 3 April 2014

This monthly progress report is submitted to U.S. Environmental Protection Agency (USEPA) and Pennsylvania Department of Environmental Protection (PADEP) pursuant to the Unilateral Administrative Order (UAO) Section VI, Paragraph 26 and documents activities that were completed at Operable Unit 2 North Penn Area 5 (NP5OU2) Superfund Site during the reporting period.

- 1) Work Plans, Plans and Other Deliverables
 - Submittals
 - o None.
 - In Agency Review
 - o None.
 - Comments or Approvals Received this Period
 - o None.
 - In Production
 - o Pre-Final (90%) Design Submittal / Pre-Final Remedial Design (90% Design) due to USEPA on 28 April 2014.
- 2) Actions Completed During Reporting Period to Achieve Compliance
 - None.
- 3) Validated Data/Results and Tests Received and/or Generated
 - None.
- 4) Health & Safety Update
 - None.
- 5) Quality Assurance
 - None.
- 6) Concerns Encountered and Corrective Actions Taken
 - None.

NP5OU2 MPR

7) Anticipated Near-Term Project Schedule

- Actions Scheduled for Next Reporting Period
 - o Continue preparation of 90% Design and submit to USEPA on 28 April 2014.
- Progress of Construction
 - o None.
- Unresolved Delays Anticipated, and Actions to be Taken
 - o None.
- Anticipated Modifications to Work Plans or Other Schedules
 - Remedial Design Implementation Timeline has been modified to reflect the date of approval of the Intermediate (60%) Design Submittal / Pre-Design Investigation Report (60% Design) granted by USEPA (see Figure 1 attached).

8) Upcoming Meetings and Conference Calls

• Tentatively propose a technical meeting during week of 16 June 2014 to discuss the 90% Design.

FIGURE 1: Remedial Design Implementation Timeline North Penn Area 5 Superfund Site Operable Unit 2 ID Task Name 4th Quarter 2nd Quarter 1st Quarter 1st Quarter 1st Quarter 1 Supervising Contractor / Project Coordinator Approved 10/1/12 10/1/12 0 days 2 Remedial Design Contractor Approved 0 days 10/15/12 10/15/12 3 Monthly Progress Reports 609 days 9/5/12 1/5/15 9/10/13 33 Annual Status of Work Reports 261 days 9/10/14 36 Remedial Design Work Plan (RDWP) 67 days 10/15/12 1/16/13 45 edays 10/15/12 11/29/12 Prepare Draft RDWF 0 days 11/29/12 11/29/12 Submit Draft RDWP EPA Review 45 edays 11/29/12 1/13/13 Technical Meeting 0 days 1/16/13 1/16/13 EPA RDWP Approva 0 days 1/16/13 1/16/13 42 Preliminary (30%) Design Submittal 97 days 1/16/13 5/31/13 Prepare Draft Report 60 edays 1/16/13 3/17/13 0 days 3/17/13 3/17/13 Submit Draft Report Technical Meeting 0 days 4/25/13 4/25/13 Access Agreement Meeting 0 days 5/9/13 5/9/13 47 EPA Review 60 edays 3/17/13 5/16/13 48 EPA 30% Design Approval 5/31/13 5/31/13 0 davs 49 Pre-Design Investigation (PDI) activities 160 days 6/3/13 1/10/14 6/3/13 8/23/13 Overburden Groundwater Field Activities 60 days Coordination / Access / Mobilization 5 days 6/3/13 6/7/13 Delineation field activities 15 days 6/10/13 6/28/13 53 Surveying locations 2 days 6/24/13 6/25/13 6/26/13 6/26/13 Well Abandonmen 1 day 55 Laboratory analytical results 20 days 7/1/13 7/26/13 10 days 7/29/13 8/9/13 Data validation 57 Data interpretation / reporting 15 days 8/5/13 8/23/13 155 days 6/10/13 1/10/14 Treatability Study Activities Groundwater and Soil collection / shipping 10 days 6/10/13 6/21/13 Treatability study microcosm construction 10 days 6/24/13 7/5/13 61 Treatability study microcosm incubation 6 mons 7/8/13 12/20/13 6 mons 7/8/13 12/20/13 Treatability study sampling and analysis 63 Treatability study interim results reporting (~30 days) 5 days 8/19/13 8/23/13 Treatability study final results reporting (~150 days) 15 days 12/23/13 1/10/14 65 Supplemental PDI Work Plan 7 days 8/20/13 8/29/13 8/20/13 Submit Supplemental PDI Work Plan 0 days EPA Review 5 days 8/20/13 8/26/13 0 days 8/29/13 8/29/13 69 70 days 8/20/13 11/25/13 Supplemental Overburden Groundwater Field Activities 10 days 8/20/13 9/2/13 Delineation field activities 5 days 9/3/13 9/9/13 72 Surveying locations 5 days 9/10/13 9/16/13 73 Laboratory analytical results 20 days 9/10/13 10/7/13 10/8/13 10/21/13 Data interpretation / reporting 25 days 10/22/13 11/25/13 76 Intermediate (60%) Design Submitta 172 days 5/31/13 1/27/14 <u>*</u> 180 edays 5/31/13 11/27/13 Prepare Draft Report 0 days 11/27/13 11/27/13 Technical Meeting 45 edays 11/27/13 1/11/14 EPA Review 60 edays 11/27/13 1/26/14 EPA Intermediate Design Approval 1/27/14 1/27/14 0 days 82 Performance well installation activities (Tentative 91 days 9/1/14 1/2/15 Coordination / Access / Mobilization 10 days 9/1/14 9/12/14 $1. The \ start/finish \ dates \ on \ this \ figure \ are \ provided \ for \ informational \ purposes \ only. \ The \ deadlines \ for \ the$ work required under the Remedial Design Work Plan (RDWP) that are enforceable as part of the schedule Well installation activities 60 days 9/15/14 12/4/14 required under the Unilateral Administrative Order (UAO) are those set forth in Paragraph 25(b) of the UAO, 9/29/14 12/4/14 Packer testing / geophysical testing 50 days as may be modified in writing by EPA under Paragraph 118 of the UAO. Well construction technical meeting 0 days 12/4/14 12/4/14 2. edays within the duration is for elapsed days. The edays unit is used for USEPA deadlines based on exact number of calendar days rather than the days unit which is for business days. Well construction / completion 10 days 12/5/14 12/18/14 3. Overburden Groundwater Field Activities required additional time as OU2 overburden groundwater was Performance well installation summary report 15 days 12/12/14 1/1/15 not delineated during the PDI work effort. Extension of submittal of the Intermediate (60%) Design submittal 89 Pre-Final (90%) Design Submittal 108 days 1/28/14 6/27/14 was granted by USEPA in letter dated 8 August 2013 to allow for the completion of Supplemental PDI field activities. Overburden groundwater delineation results from the PDI and Supplemental PDI field activities will be provided in the Intermediate (60%) Design submittal. Prepare Draft Report 90 edays 1/28/14 4/28/14 4/28/14 4/28/14 Submit Draft Report 0 days 4. Performance well installation activities are shown tentatively on the schedule for the installation of the Technical Meeting 45 edays 4/28/14 6/12/14 intermediate bedrock wells only. The actual installation dates for these wells will be finalized as part of the EPA Review 60 edays 4/28/14 6/27/14 Remedial Action Schedule developed as part of the Pre-Final (90%) Design Submittal, and the installation of the shallow bedrock wells and overburden wells will be installed during construction of the remedial action as FPA Comments 0 days 6/27/14 6/27/14 will be presented within Remedial Action Schedule and within the Remedial Action Work Plan. 95 Final (100%) Design Submittal 53 days 6/27/14 9/10/14 Prepare Final Report (address EPA Comments) 30 edays 6/27/14 7/27/14 0 days 7/27/14 EPA Review 45 edays 7/27/14 9/10/14 EPA Final Design Approval 0 days 9/10/14 9/10/14 Milestone Manual Task Е Project: 2012_1130_NP5OU2_Ge Project Summary External Milestone Manual Summary Rollup = Date: 4/2/14 Duration-only Summary External Tasks Progress